

U.S. Patent Application Serial No. **09/893,522**
Amendment filed September 12, 2007
Reply to OA dated June 12, 2007

REMARKS:

Claims 1-6 and 35-48 are currently pending. Claims 1-4 and 35-48 are currently being considered, of which claims 1-4 have been amended herein. Claims 5 and 6 have been withdrawn from consideration.

The Examiner has suggested that any solid object is slidable on a rail (Office Action dated June 12, 2007, page 2, lines 11-12). Claims 1-4 have been amended herein in order to further clarify features.

A. The Examiner has rejected claims 1 and 35/1 under 35 USC 102(b) as anticipated by USP 6,076,543 (Johnson).

Applicants respectfully traverse this rejection, for the following reasons.

Johnson fails to expressly or inherently describe the following features set forth in the subject application, *inter alia*:

1. a line supporting rail (96) being slidably mounted on an orthogonal rail (93);
2. the line supporting rail (96), when slidably mounted, being slidable in a

U.S. Patent Application Serial No. 09/893,522
Amendment filed September 12, 2007
Reply to OA dated June 12, 2007

direction orthogonal to a line (A) along the orthogonal rail (93); and

3. a plurality of coupling members (21) being slidably mounted on the line supporting rail (96) in a manner in which the line supporting rail (96) is slidably mounted on the orthogonal rail (93).

All of the above features are supported in the subject application. See the specification on page 27 at lines 4-14 and Figures 11 and 12, for example.

Johnson cannot anticipate claim 1 if there is any structural difference (MPEP § 2114). There are important and significant structural differences between **Johnson** and the features set forth in claim 1, as amended.

Johnson fails to expressly or inherently describe the following features set forth in claim 1, as amended: "the line supporting rail being slidably mounted on the at least one orthogonal rail, the line supporting rail, when slidably mounted, being slideable in a direction orthogonal to the line along the at least one orthogonal rail, the plurality of coupling members being slidably mounted on the line supporting rail in a manner in which the line supporting rail is slidably mounted on the at least one orthogonal rail," in combination with the other claimed features.

U.S. Patent Application Serial No. **09/893,522**
Amendment filed September 12, 2007
Reply to OA dated June 12, 2007

The Examiner has not demonstrated how **Johnson** could anticipate the features of claim 1, as amended.

Accordingly, Applicants respectfully submit that this rejection of claim 1 should be withdrawn. It is submitted that this rejection of claim 35/1 should be withdrawn by virtue of its dependency.

B. The Examiner has rejected claims 1-4, 35, 37-42, and 44-48 under 35 USC 103(a) as obvious over Johnson in view of USP 6,152,175 (Itoh).

Applicants respectfully traverse this rejection, for the following reasons.

Johnson and **Itoh**, alone or in combination, fail to describe, teach, or suggest the following features set forth in **claim 1**, as amended: "the line supporting rail being slidably mounted on the at least one orthogonal rail, the line supporting rail, when slidably mounted, being slideable in a direction orthogonal to the line along the at least one orthogonal rail, the plurality of coupling members being slidably mounted on the line supporting rail in a manner in which the line supporting rail is slidably mounted on the at least one orthogonal rail," in combination with the other claimed features.

U.S. Patent Application Serial No. **09/893,522**
Amendment filed September 12, 2007
Reply to OA dated June 12, 2007

The Examiner has not demonstrated how **Johnson** and **Itoh**, alone or in combination, could describe, teach, or suggest the features of claim 1.

Accordingly, in view of the above, Applicants respectfully submit that this rejection of claim 1 should be withdrawn. It is submitted that this rejection of claims 35/1, 37/1, 38/1, 39/1, 40/1, 42/1, 44/1, 45/1, 47/1, and 48/1 should be withdrawn by virtue of their dependency.

Johnson and **Itoh**, alone or in combination, fail to describe, teach, or suggest the following features set forth in **claim 2**, as amended: "the line support member being mounted on the at least one orthogonal rail, the line support member being capable of sliding along the at least one orthogonal rail in a direction orthogonal to the line after the line support member is mounted on the at least one orthogonal rail, wherein the line support member is a line supporting rail removably mounted on the at least one orthogonal rail," in combination with the other claimed features.

The Examiner has not demonstrated how **Johnson** and **Itoh**, alone or in combination, could describe, teach, or suggest the features of claim 2.

Accordingly, in view of the above, Applicants respectfully submit that this rejection of claim 2 should be withdrawn. It is submitted that this rejection of claims 35/2, 37/2, 38/2, 39/2, 40/2, 42/2, 44/2, 45/2, 47/2, and 48/2 should be withdrawn by virtue of their dependency.

U.S. Patent Application Serial No. 09/893,522
Amendment filed September 12, 2007
Reply to OA dated June 12, 2007

Johnson and **Itoh**, alone or in combination, fail to describe, teach, or suggest the following features set forth in **claim 3**, as amended: "the tracks being mounted on the at least one orthogonal rail, the tracks being slidable along the at least one orthogonal rail in a direction orthogonal to the lines after the tracks are mounted on the at least one orthogonal rail," in combination with the other claimed features.

The Examiner has not demonstrated how **Johnson** and **Itoh**, alone or in combination, could describe, teach, or suggest the features of claim 3.

Accordingly, in view of the above, Applicants respectfully submit that this rejection of claim 3 should be withdrawn. It is submitted that this rejection of claims 35/3, 37/3, and 42/3 should be withdrawn by virtue of their dependency.

Johnson and **Itoh**, alone or in combination, fail to describe, teach, or suggest the following features set forth in **claim 4**, as amended: "the tracks being mounted on the at least one orthogonal rail, the tracks being slidable along the at least one orthogonal rail in a direction orthogonal to the lines after the tracks are mounted on the at least one orthogonal rail," in combination with the other claimed features.

U.S. Patent Application Serial No. **09/893,522**

Amendment filed September 12, 2007

Reply to OA dated June 12, 2007

The Examiner has not demonstrated how **Johnson** and **Itoh**, alone or in combination, could describe, teach, or suggest the features of claim 4.

Accordingly, in view of the above, Applicants respectfully submit that this rejection of claim 4 should be withdrawn. It is submitted that this rejection of claims 35/4, 37/4, 41/4, 42/4, 46/4, 47/4, and 48/4 should be withdrawn by virtue of their dependency.

C. The Examiner has rejected claims 36 and 43 under 35 USC 103(a) as obvious over **Johnson** in view of **Itoh** and USP 6,231,260 (**Markulec**).

Applicants respectfully traverse this rejection, for the following reasons.

Johnson, **Itoh**, and **Markulec**, alone or in combination, fail to describe, teach, or suggest the following features set forth in **claim 1**, as amended: "the line supporting rail being slidably mounted on the at least one orthogonal rail, the line supporting rail, when slidably mounted, being slidable in a direction orthogonal to the line along the at least one orthogonal rail, the plurality of coupling members being slidably mounted on the line supporting rail in a manner in which the line supporting rail is slidably mounted on the at least one orthogonal rail," in combination with the other claimed features.

U.S. Patent Application Serial No. **09/893,522**
Amendment filed September 12, 2007
Reply to OA dated June 12, 2007

The Examiner has not demonstrated how **Johnson, Itoh, and Markulec**, alone or in combination, could describe, teach, or suggest the features of claim 1.

Accordingly, in view of the above, Applicants respectfully submit that this rejection of claim 36/1 should be withdrawn by virtue of its dependency.

Johnson, Itoh, and Markulec, alone or in combination, fail to describe, teach, or suggest the following features set forth in **claim 2**, as amended: "the line support member being mounted on the at least one orthogonal rail, the line support member being capable of sliding along the at least one orthogonal rail in a direction orthogonal to the line after the line support member is mounted on the at least one orthogonal rail, wherein the line support member is a line supporting rail removably mounted on the at least one orthogonal rail," in combination with the other claimed features.

The Examiner has not demonstrated how **Johnson, Itoh, and Markulec**, alone or in combination, could describe, teach, or suggest the features of claim 2.

Accordingly, in view of the above, Applicants respectfully submit that this rejection of claim 36/2 should be withdrawn by virtue of its dependency.

U.S. Patent Application Serial No. **09/893,522**
Amendment filed September 12, 2007
Reply to OA dated June 12, 2007

Johnson, Itoh, and Markulec, alone or in combination, fail to describe, teach, or suggest the following features set forth in **claim 3**, as amended: "the tracks being mounted on the at least one orthogonal rail, the tracks being slidable along the at least one orthogonal rail in a direction orthogonal to the lines after the tracks are mounted on the at least one orthogonal rail," in combination with the other claimed features.

The Examiner has not demonstrated how **Johnson, Itoh, and Markulec**, alone or in combination, could describe, teach, or suggest the features of claim 3.

Accordingly, in view of the above, Applicants respectfully submit that this rejection of claim 43/3 should be withdrawn by virtue of its dependency.

Johnson, Itoh, and Markulec, alone or in combination, fail to describe, teach, or suggest the following features set forth in **claim 4**, as amended: "the tracks being mounted on the at least one orthogonal rail, the tracks being slidable along the at least one orthogonal rail in a direction orthogonal to the lines after the tracks are mounted on the at least one orthogonal rail," in combination with the other claimed features.

The Examiner has not demonstrated how **Johnson, Itoh, and Markulec**, alone or in

U.S. Patent Application Serial No. 09/893,522
Amendment filed September 12, 2007
Reply to OA dated June 12, 2007

combination, could describe, teach, or suggest the features of claim 4.

Accordingly, in view of the above, Applicants respectfully submit that this rejection of claim 43/4 should be withdrawn by virtue of its dependency.

The U.S. Patent and Trademark Office has the burden of proof to show that an applicant is not entitled to a patent if the claimed subject matter is anticipated by, or is obvious from, the art of record. A patent applicant is entitled to a patent "unless" the U.S. Patent and Trademark Office establishes otherwise. See, e.g., *In re Dembiczak*, 175 F.3d 994, 1001 (Fed. Cir. 1999); *In re Epstein*, 32 F.3d 1559, 1564 (Fed. Cir. 1994); *In re Rijckeart*, 9 F.3d 1551, 1552 (Fed. Cir. 1992); *In re Fine*, 837 F.2d 1071, 1074 (Fed. Cir. 1988).

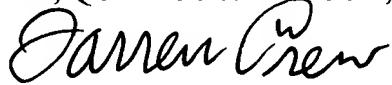
In view of the above, Applicants respectfully submit that the Examiner has not demonstrated that Applicants are not entitled to a patent.

If, for any reason, it is felt that this application is not now in condition for allowance, the Examiner is requested to contact the Applicants' undersigned attorney at the telephone number indicated below to arrange for an interview to expedite the disposition of this case.

U.S. Patent Application Serial No. **09/893,522**
Amendment filed September 12, 2007
Reply to OA dated June 12, 2007

In the event that this paper is not timely filed, the Applicants respectfully petition for an appropriate extension of time. Please charge any fees for such an extension of time and any other fees which may be due with respect to this paper, to Deposit Account No. 01-2340.

Respectfully submitted,
KRATZ, QUINTOS & HANSON, LLP



Darren Crew
Attorney for Applicants
Reg. No. 37,806

DC/lf

Atty. Docket No. **010846**
Suite 400
400 K Street, N.W.
Washington, D.C. 20005
(202) 659-2930



23850

PATENT TRADEMARK OFFICE